

## ER/WM&amp;I DDT



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**Source/Driver:** (Name & Number from  
ISP, IAG milestone, Mgmt. Action, Corres.  
Control, etc.)

**Closure #:** (Outgoing Correspondence  
Control #, if applicable)

**Due Date**

T. P. O'Rourke  
**Originator Name**

D. E. Steffen, A. M. Tyson, J. L. McAnally  
**Contractor Manager(s)**

R. H. Boyd  
**Kaiser-Hill Program Manager(s)**

T. G. Hedahl  
**Kaiser-Hill Director**

**Document Subject:**

6/25/96

TRANSMITTAL OF REQUESTED ACTION ITEMS - DES-045-96

96-RF-03879

96-RV-ER-0109-KH

**Background:**

RMRS is anxious to support the CAMU effort. Although funding is currently not available, we would like to pursue this project and need written guidance on how we should proceed.

**Discussion/Issues:**

**Alternatives/Impacts:**



**Recommendation:**

**Concurrences Obtained:**

ADMIN RECCRD

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June 25, 1996

96-RF-03879  
96-RM-ER-0109-KH

Russell H. Boyd  
Kaiser-Hill Company  
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P.O. Box 464  
Golden, Colorado 80402

TRANSMITTAL OF REQUESTED ACTION ITEMS - DES-045-96

Ref: R. H. Boyd ltr, RHB-030-96, to T. P. O'Rourke, Redirection for the CAMU, June 21, 1996

Action: Please provide written guidance on how we should proceed

The following items are attached per your referenced request::

1. A list of advantages and disadvantages for CAMU storage over disposal.
2. A draft path forward for Bob Card and Jesse Roberson to forward to the agencies.
3. A summary level schedule included in the proposed path forward.
4. A cost estimate to perform the tasks necessary to achieve a CAMU designation by March 1.

Please note that the funding necessary to achieve the tasks in FY 96 is currently not available. Additional FY 96 funds are necessary to meet the proposed schedule. In the event these additional funds are not allocated, it is unlikely that the proposed schedule could be met regardless of FY 97 funding levels since activities like agency and public comment periods cannot be accelerated.

RMRS is anxious to support this effort. Please provide written guidance on how you would like to proceed so that I can ensure our efforts are focused on successful completion. Feel free to contact me, if you have other issues or concerns.



D. E. Steffen  
Remediation Manager  
Environmental Projects Group

DES:cb

Attachments:  
As Stated

cc:  
J. L. McAnally - RMRS  
T. P. O'Rourke  
A. M. Tyson  
B080 Document Control

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## **Advantages and Disadvantages Regarding a Storage Versus Disposal Designation for a Corrective Action Management Unit ( CAMU)**

### **Advantages of a storage option over disposal.**

- According to 6 CCR-1007-3 264.552 (a) (3), the siting requirements defined in 6 CCR 1007-2, Part 2 are only applicable if wastes remain within the CAMU after closure. If we request a CAMU designation for storage only, Part 2 siting criteria do not apply.
- Deferring Part 2 siting compliance would reduce CAMU designation costs by approximately 57K, the amount estimated to complete the modeling effort. The current ASAP groundwater modeling effort will take approximately 2000 hours. Although our Part 2 compliance demonstration modeling effort will be less intense it could realistically take 600-800 hours to complete a transport/pathway analysis. This will exceed our remaining budget for FY 96. If we could defer the modeling effort we may be able to complete the draft CAMU designation request this fiscal year.
- Deferring Part 2 would also accelerate the schedule by approximately 2-3 months since model development, execution, and State review and approval probably could not occur, to a large degree, in parallel with other activities. This is due in large part to resource limitations of the K-H team and more importantly, the State.
- The current projected date that the CAMU rule may be replaced is March 1, 1997. Since it is not yet clear how far into the CAMU designation process we must be in order to be grandfathered, not having to take the time and resources to demonstrate compliance with Part 2 prior to receiving a CAMU designation would be advantageous. The potential March 1 elimination of the CAMU rule emphasizes that we need to make as much headway as possible during FY 96.
- To date, all indications from stakeholders such as RFCA comments and CAB remarks tend to support storage over disposal. This may indicate that there will be much less resistance to this path forward as opposed to a disposal alternative.

In order to maximize schedule savings, consensus between all parties needs to occur within the next two weeks.

### **Disadvantages of a storage option over disposal.**

- The primary disadvantage is that this may limit future flexibility. If we do not pursue a demonstration of meeting Part 2 siting criteria now, we run the risk of the State rejecting our demonstration later should we attempt to modify our original CAMU designation. In addition, it could be argued that this modification is significantly different from the original request and therefore is unallowable and cannot be "grandfathered". Demonstrating Part 2 compliance now virtually eliminates this risk.

This risk can be mitigated by including strong language in the designation request that identifies Part 2 as a "TBC" in our ARAR/performance standard section and further states that this would become ARAR if and when a modification for disposal is requested. This would provide a strong argument that we are operating within the authority of original designation.

- There is a risk of the proposed design not meeting Part 2 siting compliance and limiting flexibility in the future.

3 This risk can be minimized by taking additional actions:

- Ensure that an internal Part 2 compliance demonstration is conducted as part of the Title II design effort. This may be shared with the State as either informational or as part of the design approval process.
- Develop a waste acceptance criteria (WAC) predicated on the proposed HWIR "bright line" contaminant levels. Current proposed bright line numbers are predicated on  $10^{-3}$  risk and appear to be sufficiently high to accept the majority of remediation waste. This would allow waste within the CAMU to drop out of Subtitle C hazardous waste authority when HWIR is adopted. If the design meets minimum technical requirements for solid waste disposal then we could seek final action under Subtitle D. However, it should be recognized that the bright line currently is not an exit path. The path forward for managing contaminated media below the bright line would be decided by the State. This assumes that bright line standards will not be more stringent upon adoption of the HWIR media rule by the State and recognizes that Jefferson County would also become involved.
- A final disadvantage needs to be considered. From a lifecycle cost perspective, on-site disposal is clearly the most cost effective pathway to achieving final disposition of waste. Since disposal is clearly a higher risk in terms of obtaining stakeholder acceptance and achieving an ability to move forward, storage may be the only cost effective option that can be implemented in the near term.

In summary, this option presents some potential cost and schedule savings for achieving a state designated CAMU. The largest risk seem to be the limitation of future flexibility. This can be minimized during the design phase of the project.

To: Thomas P. Looby, Director  
Office of Environment  
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Jack W. McGraw, Deputy Regional Administrator  
Region VIII, U. S. Environmental Protection Agency  
One Denver Place  
999 18th Street, Suite 500  
Denver, Colorado 80202-2413

From: Jesse Roberson/Bob Card

Subject: Proposed Path Forward for the Rocky Flats Environmental Technology  
(RFETS) Site Corrective Action Management Unit (CAMU)

Attached for your review and concurrence is a proposed path forward and supporting language developed in order to accelerate the CAMU designation process at the Rocky Flats Environmental Technology Site (RFETS). This has been developed, in large part, because of the lack of progress being made in obtaining a designation for a CAMU coupled with the real possibility, discussed below, of this option being eliminated in the near future. We feel it is necessary to define an acceptable path forward so that our staff's may function more efficiently as a team, with everyone operating under the same written guidance. By defining the requirements for the CAMU designation up front, it is our hope that the interagency team can now progress in obtaining this objective within the time frame necessary to ensure that the CAMU remains a viable option for RFETS in the future.

### **Conceptual Path Forward for the RFETS CAMU**

Primary Objective. The primary objective for the CAMU is to provide an on-site storage capability for remediation waste in order to facilitate accelerated risk reduction activities and overall "mortgage" reduction; allowing more resources to be applied to sitewide risk reduction in support of the accelerated site action project (ASAP).

Conceptual Path Forward to Achieve an Approved CAMU. The vehicle for requesting CAMU approval will be in the format of an IM/IRA decision document. The scope of the document will be limited to the evaluation of the 6 CCR 1007-3 Subpart S CAMU criteria in terms of on-site storage alternatives. Since this is long term storage, it will be assumed that clean closure will occur, no waste will remain in place after closure, and therefore, no evaluation of Part 2 siting criteria will be performed. A conceptual level of design detail compliant with Subpart N minimum technical requirements will also be provided. Closure, post closure, and groundwater monitoring requirements will be identified in the decision document in sufficient detail to ensure that requirements will be met. Closure, post closure, and groundwater monitoring plans will be submitted during the design phase. A conceptual waste acceptance criteria will be developed in order to ensure that the design can be protective. Operational details such as security and construction quality assurance plans will be included as part of the design submittals.

### Assumptions Supporting the Path Forward.

- The CAMU will be used to support long term remediation waste storage.
- 6 CCR 1007-3 Part 2 siting criteria will not apply.
- The CAMU will be designed to meet 6 CCR 1007-3 Subtitle C, Subpart N minimum technical requirements.
- The CAMU will be considered and evaluated as an interim action.
- Wastes from building deactivation, decontamination, decommissioning, and demolition (D<sup>4</sup>) are considered remediation wastes.
- The Colorado Department of Health and the Environment (CDPHE), EPA, and the Department of Energy (DOE) will provide the resources necessary to ensure that a CAMU approval is achievable by March 1, 1997.
- One DOE, one agency, and one public comment period will be assumed. Implicit in this assumption is that frequent and timely interagency working group sessions will occur.

Limiting Factor/Schedule Driver. On April 29, 1996 a new proposed rule was issued by the Environmental Protection Agency (EPA). This proposed rule is titled the "Requirements for Management of Hazardous Contaminated Media" otherwise known as the Hazardous Waste Identification Rule (HWIR). One of the provisions of HWIR is that it will replace the CAMU rule. According to the proposed rule, only CAMUs that have been approved by the EPA or State agency prior to issuance of the final rule will continue to be permitted. The current scheduled date to issue the final rule is March 1, 1997. In order to ensure that a CAMU remains a viable option at RFETS, it is prudent to have an approved CAMU designation prior to this date.

Schedule. A milestone summary is included below that highlights the need to develop early consensus on a path forward to achieve an important objective within a tight time frame. The overall objective is to achieve a CAMU designation for on-site, long term storage by March 1, 1997.

### Summary Schedule.

Develop draft decision document (6 weeks) : 5-July-96/20-August-96  
Draft decision document to DOE/K-H for review: 20-August-96  
DOE/K-H review (3 weeks): 20-August/10-September  
Revise Draft DD (3 weeks): 10-September/ 1-October  
Draft DD issued to agencies: 1-October-96  
Agency review of draft DD complete (3 weeks): 2-October/23-October  
DD comment roundtable: (2 days):23-25-October-96  
Document revision (3 weeks): 25-October/15-November  
Final DD submitted to agencies for public comment: 15-November-96  
Public comment period: ( 60 days) 29-November-96/31-January-97  
Issue final DD and response summary : 21-February-96  
State of Colorado designates CAMU: (5 days) 28-February-97

### Conceptual Needs Assessment.

#### 1. General

The current and future budget reduction that face RFETS require that activities must focus on achieving the maximum risk reduction by the most cost effective manner. Construction of a CAMU allows an integrated, consolidated risk management approach for remediation wastes by providing a protective

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and cost effective reconfiguration of current contaminant sources at RFETS. Risk reduction is achieved by effectively isolating current and potential sources of contamination within the CAMU, thereby breaking existing and future potential pathways for the spread of contamination.

2. Ability to enhance environmental restoration risk reduction.

Sound environmental stewardship of RFETS will not allow wastes to remain in their current configuration. Timely source control now is essential to limit further spread of contamination which will, in turn, increase up cleanup costs in the future. Treatment and disposal costs for off-site shipment severely limit quantities of waste that can be shipped off-site. The CAMU provides a cost effective option for achieving real risk reduction now rather than deferring certain activities into the future because the funds necessary for additional waste management are not available. Deferring treatment and disposal costs now allow RFETS to concentrate funds on source control and contaminant reduction now rather than in the future. In essence, the CAMU provides an ability to concentrate limited resources on elimination of risk rather than waste handling.

3. Ability to enhance overall mortgage reduction.

Recent budget projections have estimated that upwards of 80% of the entire RFETS budget is required to maintain the status quo for maintenance and operations at the site. While necessary these expenditure do nothing to reduce the costs of doing business at RFETS. These costs are required for what has been termed "paying the mortgage". In order to reduce the mortgage and allow funding to concentrate on risk reduction activities rather than building maintenance and operations a viable, achievable, and cost effective alternative that supports reducing the mortgage must be identified. The CAMU facilitates building demolition so that limited resources can be applied to risk reduction rather than building management and maintenance. In addition, the CAMU alternative provides centralized location to minimize resources spent on monitoring and surveillance activities associated with the site. The sooner an alternative exists that allows contaminated building debris to be centralized within a protective envelope, the sooner funds now slated to monitor the status quo can be re-allocated to achieve further risk reduction.

Strategic Ties to ASAP. The basic premise of ASAP is to achieve risk reduction at RFETS in as timely and effective a manner as possible given the current budget constraints the DOE is forced to operate under. In order to achieve this, it is widely recognized that the cost of daily operations must be reduced so that limited funds can be concentrated on clean up efforts. The current priority in ASAP is to stabilize and consolidate special nuclear source materials and then focus on environmental restoration and D<sup>4</sup> activities. The CAMU provides the ability to support the ASAP concept by providing a centralized, safe, and cost effective option for consolidation and control of contaminated material at RFETS. This, in turn, allows more clean up to be achieved for the funds spent, supports the ability to reduce operations costs in a more timely manner and focuses limited resources on actual risk reduction.

We the undersigned to hereby agree, in principle, to the conceptual path forward describe above. It is now incumbent upon the interagency staff to ensure that this path forward is embodied within a CAMU designation request within the time frame necessary to maintain the CAMU as an option supporting clean up and eventual closure of RFETS.

\_\_\_\_\_  
Jesse Roberson, Manager  
U.S. Department of Energy, Rocky Flats Field Office

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Date

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Robert Card, Acting President  
Kaiser-Hill L.L.C.

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Date

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Thomas P. Looby, Director, Office of Environment  
Colorado Department of Public Health and Environment

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Date

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Jack W. McGraw, Deputy Regional Administrator  
Region VIII, U.S. Environmental Protection Agency

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Date